

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JENNIE COURTNEY, *
AS ADMINISTRATRIX OF THE *
ESTATE OF DENNIS COURTNEY, *
DECEASED, *
*
PLAINTIFF, * CIVIL ACTION NO.:
* 2:06-CV-00600-MHT
* (Removed from the Circuit Court of
v. * Covington County, AL; CV-06-110)
*
ANTHONY CLARK, et al. *

NOTICE OF SERVICE OF DISCOVERY DOCUMENTS

Please take notice that the undersigned counsel for Plaintiff has electronically filed using the CM/ECF system, and service by United States mail first class postage prepaid on this date, served on counsel for the Defendant, the following discovery pleadings:

**X Plaintiff's Interrogatories and Request for Production of Documents to
Defendant, Black Creek Integrated Systems, Inc.**

Done this the 4th day of January, 2007.

Respectfully submitted,

/s/ Will G. Phillips
WILL G. PHILLIPS (PHI044)
Attorney for Plaintiff

OF COUNSEL:

GREENE & PHILLIPS ATTORNEYS AT LAW, L.L.C.
50 North Florida Street
Mobile, AL 36607
(251) 478-1115
(251) 471-3920 – FAX

CERTIFICATE OF SERVICE

I hereby certify that I have on this the 4th day of January, 2007, I electronically filed the foregoing with Clerk of the Court using the CM/ECF system which will send notification of such filing to the following and by placing a copy of same in United States Mail, properly addressed and first-class postage prepaid, as follows:

Bert P. Taylor, Esq.
P.O. Box 489
Orange Beach, Alabama 36561

/s/ Will G. Phillips
WILL G. PHILLIPS

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JENNIE COURTNEY,	*
AS ADMINISTRATRIX OF THE	*
ESTATE OF DENNIS COURTNEY,	*
DECEASED,	*
	*
PLAINTIFF,	*
	*
	CIVIL ACTION NO.:
	2:06-CV-00600-MHT
v.	*
	(Removed from the Circuit Court of
	Covington County, AL; CV-06-110)
	*
ANTHONY CLARK, et al.	*
	*

PLAINTIFF'S FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO DEFENDANT, BLACK CREEK INTEGRATED
SYSTEMS, INC.

COMES NOW the Plaintiff in the above styled cause, pursuant to the *Federal Rules of Civil Procedure* and propounds the following First Interrogatories and First Requests for Production of Documents to the Defendants, BLACK CREEK INTEGRATED SYSTEMS, INC. to be answered and responded to fully and completely within the time required by the law.

DEFINITIONS AND INSTRUCTIONS

1. The term "you" and "your" shall mean and refer to each of the defendants, their agents, employees or subsidiaries.
2. The term "person" or "persons" shall mean all entities, including but not limited to, all individuals, associations, companies, partnerships, joint ventures, corporations, trusts, estates, public agencies, departments, bureaus, and boards.

11. Produce a true, correct and correct copy of any citations and/or penalties imposed on this Defendant as a result of the incident made the basis of this suit by any regulatory or law enforcement agency.

RESPONSE:

12. Produce a true, correct and complete copy of any investigative report produced by any regulatory or law enforcement agency as a result of the incident made the basis of this lawsuit.

RESPONSE:

13. Produce a true, correct and complete copy of any and all electronic e-mail files, word processing files, spreadsheet files, and any other electronic files in this Defendant's possession, custody or control regarding or relating to the Covington County jail facility project located in Covington County, Alabama.

RESPONSE:

GREENE & PHILLIPS, L.L.C.
Attorneys for Plaintiff

BY: /s/ Will G. Phillips
WILL G. PHILLIPS (philw3586)
J. DAVID GREENE (greej7511)
BRITT V. BETHEA (bethb9988)
50 N. Florida Street
Mobile, Alabama 36607

(251) 478-1115 – Telephone
(251) 471-3920 – Facsimile
E-Mail: wgphillips@greenephillips.com
jdgreene@greenephillips.com
bbethea@greenephillips.com

CERTIFICATE OF SERVICE

I do hereby certify that I have on this the 4th day of January, 2007 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed and postage prepaid to:

Bert P. Taylor, Esq.
Taylor Ritter, P.C.
P.O. Box 489
Orange Beach, Alabama 36561

/s/ Will G. Phillips
WILL G. PHILLIPS